

PLEASE PLEASE DON'T DO THIS - ISN'T THERE ANY WAY WE CAN AVOID THIS NON- STOP RECORDING REQUIREMENT. I KNOW WHEN THINGS LIKE THIS ARE PROPOSED THE COMMISSION IS THINKING OF THE BOTTOMLESS PIT OF MONEY AND RESOURCES OF A CLEAR CHANNEL OR THE OTHER MAJORS, PAYING 20 AND 30 AND MORE MILLION FOR ONE RADIO STATION. HOWEVER, WHEN THE HIGHEST COMMERCIAL RATE WE GET FOR A 30 SECOND ANNOUNCEMENT IS \$13, OR \$16 FOR A 60, THE WORLD CHANGES VERY RAPIDLY. WE ARE NOT IN THE MINORITY.

WHAT YOU ARE CONSIDERING HERE IS A LOT LIKE THE EAS REQUIREMENT. WHAT WE HAD DIDN'T WORK AND AS ANY PERSON WHO DEALS WITH IT KNOWS, EAS DOESN'T WORK - WHAT WE DO EVERY DAY FOR EVERYONE OF OUR LISTENERS WORKS AND BETTER THAN ANYTHING YOU OR I COULD REDISGN.

SO IT IS WITH SUCH A RECORDING REQUIREMENT. I GUARANTEE WE WOULD HAVE TO HAVE A VERY LOW SPEED - HIGH QUALITY RECORDING SYSTEM THAT WOULD COST THOUSANDS. IT WOULD CREATE A SUPER SALES INFLUX FOR THE EQUIPMENT SUPPLIERS AND MANUFACTURERS AND FOR THAT THEY WOULD BE GRATEFUL. ON THE OTHER HAND IT WOULD CREATE A HUGE HARDSHIP FOR THE STATIONS OUR SIZE, EVEN THOSE MUCH LARGER, BUT STILL SMALLER THAN THE ONES THIS IS REALLY BEING DIRECTED AT. I AM CERTAIN THERE ARE MANY OTHER LEGAL ISSUES TO BE CONSIDERED ABOUT THIS PROPOSAL BUT MOST OF US ALWAYS EXCEED THE LEGAL REQUIREMENTS OF RUNNING A GOOD STATION. THE ONLY THREAT COMES FROM 40 OR 50 STATIONS OUT OF 11,000 +. THOSE SHOCKERS - THOSE WHO LIKE TO TEST THE LIMITS OF THE LAW WILL ALWAYS BE THERE. THEY ALWAYS HAVE BEEN THERE BACK TO THE "YELLOW JOURNALISM" DAYS - BUT COOLER HEADS DID NOT PENALIZE EVERY NEWSPAPER IN THE NATION IN ORDER TO TRACK THE CONDUCT OF WILLIAM RANDOLPH HEARST AND HIS ILK. WHILE THAT MAY BE A MINOR OVERSTATEMENT I URGE THAT THE FCC PLEASE NOT DO THIS TO US AGAIN. IT MADE MILLIONS FOR A VERY FEW WITH EAS AND DIDN'T WORK. IT CERTAINLY HASN'T SAVED A LIFE BUT IT IS THE LAW AND WE SPENT THE THOUSANDS YOU INSISTED WE SPEND AND WE COMPLY WITH IT EVERY DAY.

WE STILL GET THE AMBER ALERTS VIA FAX AND EMAIL AND THEN GET THEM ON THE AIR LONG BEFORE EAS ALERTS US. WE GET THE WEATHER ALERTS FROM THE US WEATHER SERVICE AND OTHER SERVICES WE SUBSCRIBE TO VIA SATELLITE. WE GET THE NATURAL AND MAN MADE DISASTER REPORTS THROUGH OUR HIGHWAY PATROL AND LOCAL POLICE AND EVEN FASTER THROUGH OUR OWN NEWS SOURCES AND WE GET THE NATIONAL ALERTS FROM OUR NEWS NETWORK AND OTHER SOURCES WE MONITOR WELL BEFORE EAS IN EVERY SINGLE CASE. WE ARE STILL TOLD EAS IS SOME KIND OF SAVING GRACE. WE ARE STILL WAITING FOR AN ALERT OF ANY KIND THAT WE HAD NOT ALREADY HAD ON THE AIR. STILL WE COMPLY. THAT BEING PROVABLE PLEASE DO NOT FORCE US TO AGAIN HELP THE EQUIPMENT DEALERS AND MANUFACTURERS FOR SOMETHING THAT WORKS AN UNFAIR HARDSHIP ON 10,950 STATIONS SO A CLOSER EYE CAN BE KEPT ON THE OTHER 50. (THESE ARE MY NUMBERS BUT I HOPE YOU GET THE IDEA OF MY COMMENT). IT WILL SERVE LITTLE OR NO PURPOSE BUT IT WILL FORCE STATIONS ALREADY LOSING MONEY OR BARELY BREAKING EVEN - THE MAJORITY, INTO AN ADDED HARDSHIP WITH LITTLE OR NO GAIN FOR THE PUBLIC.

PLEASE ACCEPT MY APPOLOGIES FOR THE TONE OF THIS BUT FOR 45 YEARS I HAVE WAITED FOR THE FCC TO FORCE ME TO DO SOMETHING THAT WAS BETTER FOR OUR LISTENERS THAN WHAT THE MAJORITY OF BROADCASTERS WERE ALREADY DOING. THIS HAS LITTLE OR NO CHANCE OF BEING THE FIRST TO ACCOMPLISH THAT.

LEST YOU VIEW ME AS A HYSTERIC, I ABSOLUTELY FAVOR FCC REGULATION AND UNDERSTAND TOTALLY THE HIGH PURPOSE IT INTENDS TO SERVE AMERICA.

WITH RESPECT AND APOLOGIES FOR THE TONE,

BILL BUCHANAN

KSHN RADIO

LIBERTY, TX